

RECEIVED
OCT 6 '94
FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

September 30, 1994

Mr. William Cross
Private Radio Bureau
Personal Radio Branch
Federal Communications Commission, 2025M
Room 5002
Mail Stop 1700
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

References: PR Docket No. 94-59
HF Digital Auto-Forwarding
Letter from WØRA dated August 12, 1994

Dear Mr. Cross:

Due to the press of time, this letter is being faxed to meet the October 1, 1994 comment deadline for PR 94-59. The original and appropriate copies will be sent to you by Federal Express for delivery on Monday October 3, 1994.

Please add the following comments on Docket PR 94-59 to the body of comment already submitted in my letter referenced above, dated August 12, 1994.

Referring to the above referenced Docket dated June 23, 1994:

"II. Background"

"2. The propagation characteristics of the HF bands allow for long distance communications. Amateur operators take advantage of these characteristics to communicate with other amateur stations, particularly those in other countries. Establishing and maintaining a HF communications link, however, presents operating demands not encountered on the Very High Frequency (VHF) and higher frequency bands frequencies above 30 Mhz. The variables affecting communications in the HF bands are highly complex. To maintain the communications link and avoid causing interference to the communications of other amateur stations, the control operator constantly monitors the activity on the channel being used and adjusts the station's transmitting parameters as needed. Because the presence of the control operator has been imperative for proper operation in such systems, automatic control of an amateur station that is transmitting on an HF band has not been authorized."

No. of Copies rec'd
List A B C D E

041

COMMENT

The primary underlying premises stated in the above excerpt from Docket PR 94-59 namely,

- 1) The characteristics of the HF bands differ substantially from the VHF bands.
- 2) The potential for interference to other amateur radio operations is greater on the HF bands than on the VHF bands.
- 3) Due to these considerations a "control operator" is REQUIRED for digital communications on the HF bands.

are intended to support the notion that automatic HF digital operations should:

- a) Require a control operator in order to be successful.
- b) Require a control operator to prevent interference.

My lifelong history of over 40 years of operating on these frequencies and a careful evaluation of each premise finds no support for any of these underlying principles.

1. While the characteristics of HF and VHF differ, HF operation has no less communications consistency and no less of a successful track record for transfer of digital information than does VHF digital operation.
2. Again, although distances covered are shorter for VHF communications, more amateurs are licensed to use VHF, more in fact do use them and as a consequence there is NO LESS of a potential for interference to amateur radio operations on VHF than on HF. As a matter of fact, the interference potential is GREATER on VHF than on HF.
3. HF operations without a "Control Operator" have been practiced for the past ten years in Canada and for a shorter period in the USA. During this period no documented cases of interference due to automatic digital operations have been delineated by FCC or by the counterpart agency in Canada.

In light of the foregoing, I reject the concept that the underlying premises designed to support PR 94-59 do in fact support it.

Rather, I believe that ARRL has, in no way, established a NEED for regulation of HF digital radio operations beyond what is now practiced for automatic digital operations in the VHF spectrum.

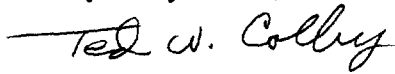
Further, I believe, there is no basis for regulation of HF digital operations within narrow subbands as requested in Docket PR 94-59. As a minimum, the subband provision in Docket PR 94-59 should be eliminated.

Finally, I appeal to the Commission to delay final action on Docket PR 94-59 by a period of 120 days. This delay is needed to supply additional data which supports the following:

- 1) No additional regulation is needed for HF digital operations beyond what is employed for VHF based automatic digital operations.
- 2) No additional cost to the government can be justified to enforce violations of HF subbands by amateur digital operations.

These comments on Docket PR 94-59 are respectfully submitted to the Commission.

Very Truly Yours,

A handwritten signature in cursive script that reads "Ted W. Colby". The signature is written in dark ink and is positioned above the printed name.

Ted W. Colby, WØRA